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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	No. 15-CR-416 WHA
)	
14 Plaintiff,)	STIPULATION TO EXCLUDE TIME
)	UNDER THE SPEEDY TRIAL ACT;
15 v.)	PROPOSED ORDER
)	
16 CLAUDIO MACIEL,)	
)	
17 Defendant.)	
)	

18
19 **STIPULATION**

20 The United States of America, by and through Special Assistant United States Attorney Philip
21 Kopczynski, and Defendant Claudio Maciel, by and through his attorney John Forsyth, hereby stipulate
22 that, with the Court's approval, the time between September 22, 2015 and October 20, 2015 is
23 excludable under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective
24 preparation by defense counsel. Defense counsel will use the excluded time to conduct investigation

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STIP. TO EXCLUDE TIME; ~~PROPOSED~~ ORDER
NO. 15-CR-416 WHA

1 and review the discovery produced by the government.

2 IT IS SO STIPULATED.

3 Dated: September 22, 2015

_____/s/_____
PHILIP KOPCZYNSKI
Special Assistant United States Attorney

6 Dated: September 22, 2015

_____/s/_____
JOHN D. FORSYTH
Attorney for Defendant

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, upon stipulation of the parties,


THE COURT FINDS that failing to exclude the time between September 22, 2015 and October 20, 2015 would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

THE COURT FURTHER FINDS that the ends of justice served by excluding the time between September 22, 2015 and October 20, 2015 from computation under the Speedy Trial Act outweigh the interests of the public and the defendant in a speedy trial.

THEREFORE, IT IS HEREBY ORDERED that the time between September 22, 2015 and October 20, 2015 shall be excluded from computation under the Speedy Trial Act.

IT IS SO ORDERED.

Dated: September ²⁴, 2015



HON. WILLIAM ALSUP
United States District Judge